

**Title:** High Risk Evaluation Criteria

**Purpose**

Criteria are needed to evaluate how the WIC Program is actually handled at the retail sites, and to ensure that benefits are processed according to established WIC procedures. Criteria will show where abuse or fraud may take place.

**Authority**

7 CFR 246.12 (j)

**Policy**

It is the policy of the Montana WIC Program that standardized criteria are used as guidelines to evaluate WIC retailers on a yearly basis. Such criteria will be applied equally to all retailers.

---

**I. High-risk criteria will include, but not be limited to:**

- A. Low variance in benefit prices;
- B. High average price in peer group;
- C. Redeemed cost higher than list price;
- D. Multiple participant complaints;
- E. New retailers;
- F. Inappropriate volume change.
- G. Volume of WIC business

**II. Follow-Up Action**

- A. High-risk retailers will be ranked to determine which stores receive a compliance investigation. A compliance investigation will consist of either compliance buys or an inventory audit.